Jane Cottrell
Nez Perce National Forest Supervisor 1005 Highway 13
Grangeville, ID 83530

August 29, 2005

RE: **Red Pines FEIS**

Dear Supervisor Cottrell:

The following comments are submitted by Friends of the Clearwater (FOC), Alliance for the Wild Rockies (A WR), the Ecology Center (TECI), Idaho Sporting Congress (ISC), and the Lands Council (TLC) on the Red Pines final environmental impact statement (DEIS). Please incorporate the comments submitted on the earlier DEIS on this proposal. Rather than being redundant, these comments will focus on the changes made in the FEIS and the response to comments.

The FS responses in Chapter IV to comments do not adequately address a number of concerns brought up by people who commented. Insufficient replies to comments include:

Trying to stop potentially large intensive fires should take a backseat to fixing the present real problems such as water quality degradation. A fire severity should be looked at as opposed to fire intensity. Furthermore, logging to prevent degradation from fire is not supported by agency scientists (see Reducing Fire Risks to Save Fish-A Question of Identifying Risk, A position Paper by the Western Montana Level I Bull Trout Team provided to your office in the past).

Trying to "create some spatial fragmentation" in a landscape that already has a great deal of spatial fragmentation is useless. The adverse impacts to the natural environment from this activity will far outweigh any possible benefits from creating more spatial fragmentation.

The roads analysis for the Nez Perce NF is not final therefore no proposed road work proposed in Red Pines should be considered until it is final. The NPNF roads analysis is over 2 years overdue. The draft report is insufficient and will need to provide more information before it meets the goals and objectives of the process. See Friends of the Clearwater comments on the draft dated March 15, 2005.

Response 14-87 says, "No complete inventory of all terrain vehicle trails, whether system trails or user-created trails, was done for this project." "No changes are being planned to managing illegal road use." (response 14-93). This is a violation of the roads analysis process and without knowing this information the NPNF cannot accurately gauge the impacts to the project are.

The road densities in the Red Pines project area are over 3.5 miles per square mile. This level is way above what is considered appropriate for wildlife and fish. The majority of streams in the area are in poor condition and building more temporary roads will only make things worse.

Forest Service Response

Response 3-1. Focused comments.
Thank you.

Response 3-2. fire/fish.
Fire severity and its relationship to fire intensity is discussed throughout Chapter III-Section 3.7-Pages 3-119 to 3-129.

The effects of dispersed fuel treatments and how they can facilitate suppression actions is discussed in Chapter III-Section 3.7 Fire-Pages 3-127 and 3-128.

Response 3-3. Roads analysis,
The roads analysis used as the basis for this project was completed as part of the Red River Ecosystem Analysis at the Watershed Scale (EAWS; 2003), which is consistent with the requirements of Forest Service Manual (FSM) 7700, section 7712. A Forest-scale roads analysis was completed May 16, 2005.

Response 3-4. All terrain vehicles.
The Red Pines purpose and need is not related to all terrain vehicle trails. The future planning process that the Forest will be undertaking as part of the Travel Management and Off Highway Vehicle Rule (November 9, 2005 in the Federal Register) will more thoroughly address this issue and make decisions related to system and/or user created trails and travel management in the Red River watershed..

Response 3-5. Road density, Temporary Roads.
See FEIS, Chapter III, Section 3.5.6.3. The selected alternative E will reduce road densities in the Red River watershed from 3.6 to 3.0 miles per square mile. Road decommissioning of 104 miles of road and treatment of 43 stream crossing will improve stream condition. The proposed 19 miles of temporary road have an estimated 8 temporary stream crossings. The road density effects to wildlife were analyzed and presented regarding Elk Habitat Effectiveness. Alternative E provides and improved condition in 9 of 17 EHE units, an improvement to forest plan standards in 4 EHE units. (FEIS, Chapter III, Section 3.12.7.6, Pages 3-240-246).

The need to decrease sediment by 25% in the Red River watershed will not be helped by the Red Pines proposal. "About 12 miles of temporary road construction are proposed (Alternative E) on soil substrata rated high for erosion hazard," (response 14-94).

Response 3-6. Sediment, roads, high erosion hazard.
The 25% reduction in human-caused sediment yield is a requirement of the South Fork Clearwater River sediment TMDL. It is tracked at the scale of the mainstem South Fork Clearwater River. Every project in each contributing watershed is not required to meet the 25% reduction requirement. The Red Pines project contributes to a long term net reduction of sediment yield in Red River and the South Fork Clearwater River through decommissioning of existing roads and other erosion reduction measures. This is documented in Section 3.5 of the FEIS.

Your responses to comments often talk about reducing the risk of high severity fires. Nowhere in the FEIS is there any data that shows where and how many acres have burned in the last 50 years at high severity. A map showing these areas would be helpful and what condition these lands are in today should be disclosed to the public.

Response 3-7. Past wildfires.
Although there have been hundreds of ignitions, Fire History Mapping shows no large fire growth in the entire Red River drainage within the last 50 years. Consequently, there have been no high severity fires. Fire history of the Red River watershed was posted on the Nez Perce National Forest webpage, Map 9 of the Red River EAWS. http://www.fs.fed.us/r1/nezperce/projects/eaws-red-river/maps/09_fire_history.pdf.

Your response 4-8 says only 3 percent of the Red River watershed is proposed for fuel reduction projects. This small amount of area treated will most likely have no or little effect on fire behavior. Most fire science shows climate has more to do with fire behavior than fuel loading.

Response 3-8. fire behavior.
The effectiveness of fuel treatment is directly proportionate to the percent of ground being treated. The effectiveness of treatments that alter fire behavior and facilitate suppression and how often these treatments need to be maintained varies with forest type, climate, soils, landscape patterns and overall forest health. Despite these variations, the bottom line is that fuel treatments reduce the threat of intense fires. Climate and fuels are closely related when discussing them in the context of fire behavior. Climate can drive the fuels in availability for combustion, resulting flame length and heat output, and future fuel loadings. Conversely, climate can drive fuels to moisture of extinction.

The Red Pines proposal will cost the taxpayers dollars for just the logging part of the project. There is no money to complete the watershed restoration. Without the restoration this project by all accounts will degrade the watershed.

Response 3-9. costs.
There are numerous sources of funding for watershed restoration projects, including Forest Service allocated funds, which incidentally, also cost taxpayer dollars. Restoration activities will proceed at a rate equal to offset the implementation of fuel reduction activities. See also requirements of the Biological Opinions (ROD Appendix B).

The letter from US EPA, letter 5, states that the EIS gives insufficient information. We agree and hope the NPNF will disclose more relevant information on water quality, fire risk, cumulative impacts and other important issues.

Response 3-10. EPA, water quality.
See FEIS Comment Letter #2 from the EPA, FEIS Comment Letter & Response #6-4(ROD, Appendix C).

The FEIS does not describe how the South Fork TMDL will be met in regards to the Red Pines proposal or cumulative impacts throughout the watershed.

Response 3-11. TMDL.
See TMDL response 3-10 above. The South Fork TMDLs and cumulative effects in the South Fork Clearwater River are discussed in the FEIS on pages 3-46 through 3-47 and 3-76 through 3-82. In a letter dated June 8, 2005, the IDEQ concluded that Alternative E "appears to be consistent with the intent of the South Fork Clearwater River TMDL" (ROD, Appendix C, Letter #1).

The FEIS gives inadequate information about Socio-Economic effects of the proposal. The activities analyzed did not include the positive impacts that a fire would have on the public resources nor did they evaluate the non-market impacts of the Red Pines proposal. Table m-149 displays the costs and revenues of Alternative E. The total costs are $5 million over the revenues. There is no plan to find this money to do the restoration. This is in violation of NFMA.

Response 3-12. Scio-economics.
Refer to Response in the FEIS, Chapter IV, Section 4.5, Letter-Comment # 14-48 related to funding sources for restoration work.

Response 13-1 gives an insufficient reply in regards to monitoring. The NPNF is woefully behind in producing monitoring reports. The report for FY 2003 is not complete at this time. This is a violation of the Forest Plan. The FOC analysis of past NPNF monitoring reports also points out several problems.

Response 3-13. Monitoring.
The Forest Monitoring Report for 2003-2004 is currently competed and available at the Nez Perce National Forest webpage. http://www.fs.fed.us/r1/nezperce/projects/monitoring-2003-2004/fy03-04report.pdf.

The Red Pines proposal will do little to protect resources over a landscape scale.

Response 3-14. Amount of proposal to protect resources.
Comment too general to respond relative to the protection of resources.

Response 13-4 makes it clear the NPNF is unwilling to amend the Forest Plan to allow WFU in more areas on the forest. Considering other amendments are being proposed, this type of amendment is appropriate at this time.

Response 3-15. Amendments, WFU.
Wildland Fire Use is not part of the purpose and need for this project.

Speaking of forest plan amendments, it is unclear whether the forest plan would be amended under the various alternatives (including the new alternative E) regarding MA 1 and MA 21. As such, it is not clear that the forest plan is being met as MA 1 is unsuitable for logging and MA 21 has several constraints for logging. This needs to be adequately addressed.

Response 3-16. Amendments, MA 1 and MA21.
There are no amendments proposed for MA 1 or MA 21.
This decision will not reallocate MA1. MA1 is minimum management activities, these areas described in the forest plan include rock outcroppings, skree, shallow soils. MA1 areas are classified as unsuitable for timber harvest. There is less than 1% (454 acres) of the project area in MA1 (FEIS, Chapter I, Page. 1-7). See Chapter III, page 3-142 for a more detailed discussion of proposed management activities in MA1.
This decision will reallocate MA 20 (FEIS, Volume 2, Map 15 – Old Growth).

Using non-NEPA documents to define desired conditions does not allow the public to comment on desired conditions.

Response 3-17. non-NEPA document.
Two non-NEPA document referenced include the Red River EAWS and the SF Clearwater Landscape Assessment and are available at the Nez Perce Forest webpage. These documents were used in the analysis included in the FEIS. http://www.fs.fed.us/r1/nezperce/projects/

Alternative E does not satisfy many concerns brought up by a host of comment respondents. The Red Pines proposal did not provide a wide range of alternatives even though many people asked for other alternatives to be considered. It was pointed out that every action alternative is illegal under the current forest plan. Alternative E also falls into this category. It is simply an alternative that has fewer exceptions to the water quality standards. It does amend the soil protection standards like the others.

Response 3-18. Alternatives, amendments.
See rationale in the Record of Decision for the Selected Alternative and Amendments (ROD Sections 1.3, and 1.4).

Furthermore, the justification for not having a legal alternative under the current Forest Plan (FEIS page 2-5) uses convoluted logic. Appendix A does not prohibit watershed and habitat improvement projects without logging in below standard watersheds. It simply requires that any logging must be accompanied by real habitat and watershed restoration and then only if an upward trend (present tense) is shown, otherwise logging can't occur. Conflating logging with watershed restoration and adopting a mentality of "robbing Peter to pay Paul" has resulted in an inadequate alternative evaluation and a the clear language in the Forest Plan.

Response 3-19. NEPA, Forest Plan, Appendix A.
See Response 3-18 and ROD Section 1.3.5 and 1.4, and 1.8.12.1.

Future modeled water quality is no surrogate for a proven monitored trend supported by recent data. So using NEZ SED to "predict" an upward tread is not good enough, considering the limitations of the model. See response 13-18.

Not including the Blacktail project in considering cumulative impacts is a problem. In addition response 13-17 says "not all ongoing and proposed activities are modeled in the ECA or sediment analyses."

The NEP A documents must disclose how projects comply with applicable substantive requirements, and if they leave something out or misconstrue one of those requirements, it is a violation of NEP A. The Red Pines NEP A documents do not adequately disclose information on TMDL, beneficial uses and other requirements.

Designing the Red Pines proposal to avoid moderate risk of landslides would be wise. Any human disturbance planned such as Red Pines should expect a 20 year flood event and be designed for zero impact from such an event. Considering 1976 and 1996 both had major impacts, another similar event is likely in the next few years. Temporary roads in place for three years around 2006 are vulnerable to failure that likely adversely impact water quality.

Concerns about soil productivity have not been adequately addressed. No NPNF data on impaired soils is available so it is impossible to gauge if the planning goals are being met. The Red Pines project would likely increase the impaired soil productivity on the forest.

Alternative E is designed to show an upward trend for fish/water quality but your response says, "the existing condition of streams in the Red River watershed suggests that fish/ water quality are not being met."(13-28). Given that, this proposed project should be dropped.

Response 3-20. Nezsed.
NEZSED is one tool used to assess water quality and habitat carrying trends in Red River. A full discussion of the aquatic trend analysis, including the used of monitoring data, is found in Appendix H of the FEIS.

Response 3-21. Cumulative effects, ECA, Nezsed.
The Blacktail analysis was not included in the NEZSED and ECA figures for the South Fork Clearwater River because its proposed action and the subsequent modeling were not complete enough to incorporate into the analysis. However, the Blacktail Project was considered and narratively discussed in the cumulative effects section on page 3-79 of the FEIS. The other activities that are not included in the ECA or NEZSED analysis are either those actions not fully developed or those for which modeling coefficients are not available. The latter include grazing and mining, which are incorporated in the cumulative effects analysis for Red River and discussed in the narrative. The limitations of NEZSED and ECA modeling are discussed in Appendix H of the FEIS.

Response 3-22. Disclosure, TMDL, Beneficial Uses.
Compliance relative to the TMDL is a State determination (See FEIS-Comment Letter #1). Information relative to beneficial uses is presented in the FEIS Chapter III, Sections 3.5.5.1 and 3.6.8. Compliance with other requirements is presented in the ROD, Section 1.8 and see Section 1.8.4, 1.8.11 and 1.8.12.

Response 3-23. Landslide Prone moderate risk.
Fields reviews of planned units during layout will identify any more small inclusions of significant landslide risk and adjust either unit boundaries or harvest prescriptions to minimize landslide risk. See the Table II-2, item 6 in the FEIS.

Response 3-24. soil productivity.
Descriptions of soil conditions are presented in Chapter 3, Section 3.4. These are based on site specific assessments of past harvest activities and other disturbances in the watershed. Areas of prior harvest proposed for additional entries were specifically evaluated for percent detrimental disturbance and opportunities for restoration. See Table III-8. Strong design and mitigation measures are required to protect soil resources (see Tables II-2 and II-3). Detailed monitoring is required during and after implementation to ensure that resultant conditions will comply with the soil quality standards as amended, and evaluate if soil restoration meets the stated objectives of increasing infiltration and improved ability to support native vegetation (Appendix I). That monitoring will be presented in the Forest monitoring report or other venue accessible to all.

Response 3-25. upward trend.
The existing condition of Red River streams was clearly disclosed in both the DEIS and FEIS. Because streams are not meeting their objectives, we designed Alternative E to produce an upward trend, as directed by the Nez Perce Forest Plan. If we drop any of the proposed action alternatives, no improvement projects would be implemented, and the streams will continue to not meet their objectives.

Response 13-31 states, ".. .we must keep connectivity of species and gene pools across wide areas so there are not barriers to migration." This appears to go against the purpose and need of this proposal of trying to "create some spatial fragmentation".

Response 3-26. species connectivity.
Maintaining connectivity of species and gene pools may require levels of disturbance necessary to sustain those species across the landscape. Larch, ponderosa pine, and lodgepole pine would need some fire or fire surrogate to persist in the landscape, so that they could move by colonizing recently disturbed sites. There needs to be some disturbance, but not large and severe enough to result in local extirpation that seed or root systems cannot bridge.

There is a lack of evidence provided by the NPNF that the Red Pines proposal will in fact decrease fire severity on the treated landscape. Response 13-35a acknowledged that climate has more to do with fire behavior than fuel treatments and only under moderate weather conditions would there likely be any effect. You never disclosed what percent of the time this might occur and what percent of the time would fuel treatments actually make a difference. A decision-maker cannot judge if the probability of lessening a severe fire is worth the adverse impacts to the resource overall.

Response 3-27. fire probability.
While we cannot control the weather, we can treat fuel to modify the effects of fire, that is the intensity and resultant severity. We acknowledge that fire under the worst-case weather conditions is rarely responsive to either treatment or suppression. However, fire danger as measured by the Energy Release Component index (ERC) shows that the Red Pines area is at extreme fire danger on average only 3% of the days during the normal fire season. The Nez Perce Forest uses ERC as the index for fire danger. Historical weather data obtained from the Red River Remote Automated Weather Station (RAWS) is used to calculate ERC which in turn is used to determine the relative fire danger values. The percent of days by adjective fire danger are:

Low = 20%
Moderate = 30%
High = 39%
Very High = 8%
Extreme = 3%

What this project is attempting to do is modify fire behavior in the conditions that would have historically produced large fires but are not the worst-case conditions. Only under the worst-case weather conditions is fire rarely responsive to treatment or suppression, therefore using extreme as worst-case, 97% of the time fuel treatments would be effective.

Wildlife viability for MIS and TES have not been monitored as directed by the forest plan. This, coupled an inadequate definition of old growth and inaccurate inventories will make any species viability analysis flawed. This is a violation of NFMA.

Response 3-28. wildlife monitoring, old growth.

The Forest Plan monitoring and evaluation reports related species monitoring results and general trends. A summary record of Forest Plan monitoring for MIS and TES species over the past 16 years is included in and supports a terrestrial species analysis document titled: "Red Pines Post-Mountain Pine Beetle Epidemic Fuels Reduction Project: Effects at the Project, Forest and Regional Scales – Compatibility with NFMA Requirements for Maintaining Species Viability, March 2005" . This document is available in the project files

"A Conservation Assessment of the Northern Goshawk, Black-backed Woodpecker, Flammulated Owl, and Pileated woodpecker in the Northern Region, USDA Forest Service (Samson 2006)" has been completed. This assessment indicates "…short-term viability is not an issue in Region 1 for northern goshawk, black-backed woodpecker, flammulated owl or pileated woodpecker." Additionally, "Habitat Estimates For Maintaining Viable Populations of the Northern Goshawk, Black-backed Woodpecker, Flammulated Owl, Pileated Woodpecker, American Marten, and Fisher (Samson 2006)" has been incorporated into the Red Pines analysis. This document indicates "The six species considered in this assessment are secure in terms of persistence." and "Comparison of habitat required for a species-specific minimum viable population to that available indicates well-distributed habitat far excess to that needed…"

In response 13-44b recognizes the different between old growth habitat and needed habitat for old growth dependent species. This clearly points out the inadequate definition of old growth used by the NPNF.

Response 3-28a: old growth and species
We are aware that old growth habitat can be defined many ways. In response to concerns about the Forest Plan old growth definition, the North Idaho Old Growth Guidelines were also used.

Fragmentation of old growth has adverse impacts on wildlife.

Response 3-28b: Fragmentation. We agree that fragmentation of old growth can adversely impacts some wildlife species. This is acknowledged in section 3.12.7.1 and edge effects (effects of habitat fragmentation) are discussed in section 3.12.7.3, 3.8.4.1, 3.8.4.2, 3.8.5.1, 3.8.6.1, 3.8.6.2, 3.8.6.3.

"The effects of roads are not addressed." (response 14-124).

"Restoration" of old growth would most likely degrade the characteristics of the stand. This so-called restoration is unneeded and will likely change the long term value of the old growth. Impacting the natural functions and processes at work in old growth will likely degrade the stand in terms of wildlife habitat

Neither the Green et a1 nor the Forest Plan definition of old growth are likely the "best science" definition of old growth, particularly the impacts on old growth species.

The FElS reflects a loss of habitat for those species even when old growth logging is not anticipated. Thus, neither definition adequately works for old growth dependent species protection and neither definition can be considered adequate as a surrogate for real population monitoring.

Goshawk habitat "treated" would degrade habitat for goshawk and would contribute to the decline in goshawks. (response 14-1 14b). Openings greater than 4 acres will also hurt goshawk habitat.

The proposed amendments proposed will not "strike a desired balance between the vegetation management and aquatic objectives." (response 14-38) The vegetation management mayor may not lower the risk of a high severity fire. The aquatic objectives will not be helped but hurt by the amendments, so how is this a "balance"?

Response 3-28c: Road effects.
Roads are addressed in the following Wildlife sections of the FEIS: 3.1.2.1, 3.1.3, 3.1.4.2, Table III-5, 3.1.5.6, 3.1.7.1, 3.1.7.2, 3.1.7.3, 3.1.7.4, 3.1.7.5, 3.1.7.6, and 3.1.8.4

Response 3-28d: Old growth restoration.
"Restoration of old growth" is not proposed in this project.

Response 3-28e: Old growth, best science.
Lacking any suggested definition that you would consider "best science", we will continue using the Forest Plan and Green et al. old growth definitions. The Forest Plan definition is used because that is what the Forest Service agreed upon when the Forest Plan NEPA process was completed. At this time, Green et al is considered "best science" for the following reasons: 1) the data gathered for the Green et al. document uses local data from the Nez Perce Forest and 2) to date, we are unaware of a more accurate local effort or scientific study available to define old growth habitat on the Nez Perce *Forest.*

The Forest Plan definition of old growth defines some forest attributes associated with a late stage of plant succession in the Forest Plan. This definition is based on the work of Thomas and others for Washington and Oregon and it is not always appropriate to the different species, climate, disturbance regimes, and soils of the Northern Region. The national Forest Service definition in 1989 more generally defined old growth as "ecosystems distinguished by old trees and related structural attributes." Green et al, published in 1992 and errata corrected in 2005 used large local data sets to refine the generic description. We used biophysical settings (habitat type groups) and existing vegetation type (forest type) as the primary ecological stratifications for screening 680,000 plots for the Idaho Panhandle, Clearwater and Nez Perce National Forests. Of those that met the preliminary screening criteria, 23,822 were used in subsequent analysis to develop the definitions for north Idaho. The definitions were derived from this data set with the participation of ecologists, silviculturists, and wildlife biologists. They have since been intensively reviewed and errors have been corrected. The definitions have been adopted for use in forest plan revision. We consider it the best current science for defining old growth, but recognize that because of the great variation in old growth stand structures, no set of numbers can be relied upon to correctly classify every stand. The north Idaho definitions do not address patch size, pattern and connectivity in the landscape, how much old growth was historically present, or how natural or managed disturbances may sustain or alter old growth form and function, or how such impacts might affect old growth associated species.

Response 3-28f: old growth species
The FEIS reflects a reduction of habitat for old growth associated species because these species use non-old growth habitats. Habitat reductions are a result of reductions in the non-old growth habitats used by these species. The analysis indicators used to display differences between alternatives on old growth associated species are not synonymous with identifying old growth habitat according to the Forest Plan or North Idaho Old Growth definitions.

Response 3-29. goshawk
Suitable goshawk habitat treated under each action alternative would not be considered suitable after treatment. Table III-88 displays goshawk habitat acres treated by alternative.

Response 3-30. veg & fire risk.
Forest Plan amendments would be required to implement many watershed restoration activities even in the absence of fuel treatment. Road decommissioning alone is considered a sediment-producing activity. Amendments to Appendix A are needed to allow road decommissioning and other restoration activities; therefore they contribute to aquatic objectives being met over the long-term.

"No changes are being planned to manage illegal road or trail use." (response 14-90). Given this approach to this ever growing problem, more adverse impacts to water quality can be expected but the NPNF has failed to take this into account. "Crime is contagious. If the government becomes a law breaker, it breeds contempt for the law." -Justice Louis D. Brandeis.

Response 3-31. trail use, water quality.
See Response 3-4.

The Red Pines proposal would degrade a 303d listed watershed, change the Forest Plan to allow logging and road building to further degrade the Red River watershed, allow logging and road building in RHCAs when RMOs are not being met, not complete the roads analysis, not enforce illegal road and trail use, not provide an adequate economics analysis and not protect MIS species.

Response 3-32. 303d list, RHCAs, RMO, Road analysis, road/trail use, MIS.
See Response 3-6, 3-10, 3-11,3-22 related to the 303d (TMDL) issue.
There is no logging proposed in RHCA's in Alternatives C, D or E.
There are approximately 8 new temporary road stream crossings that will be decommissioned within 3 years of construction with Alternative E. See FEIS, Chapter III, Page 3-107, Table III-43.
See Response 3-3 related to roads analysis completed.
See Response 3-4 related to illegal road and trail use.
See FEIS Section 3.18 for the economic analysis completed.
See Response 3-28 related to MIS species protection.

The FEIS includes information not explicitly analyzed in the DEIS (nor in the FEIS either). Appendix J mentions openings greater than 40 acres in size. This was not an issue in the DEIS, except that the regional guide was mentioned (as it was done in the FEIS). Nothing site-specific was analyzed.. This violates NEPA

Response 3-33. Appendix J.
The site-specific analysis regarding openings greater than 40 acres is contain in Appendix J of the FEIS as required.

Summary

Little has changed from the draft to the final except the adoption of an alternative that has fewer forest plan amendments. Given all these problems with this proposal, we suggest the NPNF withdraw the proposal.

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Sincerely,

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